



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

101237

March 18, 1993

Ms. Margie Zhang
State of Delaware
DNREC
Division of Air & Waste Management
715 Grantham Lane
New Castle, DE 19720

Re: Tyler Refrigeration Site, Smyrna, DE

Dear Ms. Zhang:

I am writing in response to your letter dated March 1, 1993, our meeting on March 5, 1993 and our follow-up conference call on March 10, 1993. EPA has reviewed the proposal outlined in your March 1st letter and would like clarification on some of the points made by DNREC.

1. In the proposal DNREC has delineated the plume of TCA contamination. This delineation was based on ground water data obtained from 3 monitoring wells and proposed ground water flow. Does DNREC feel that this delineation is adequate to effectively place a recovery well? Should more data be obtained to better define the extent of the plume and/or to confirm that the existing data is indeed representative of conditions on site?

2. EPA is concerned with what controls would be used to ensure that Metal Masters would operate the recovery well system so that it would function to properly "pump and treat" the contaminated ground water. As you know, Metal Masters is not participating in the on going RI/FS at the site nor are they presently under any agreement with EPA to perform remediation. What enforcement authority would DNREC use to ensure that the pump and treat proposal was installed and operated in a manner to ensure remediation of the aquifer?

3. On the second page, 3rd paragraph of the proposal "a 6 inch diameter well with submersible pump could meet the required flow of about 40 gpm." Where were these system specifications obtained? Is further design effort necessary to ensure proper recovery and treatment of contaminated ground water?

4. During the conference call, DNREC referred to the action outlined in the proposal as an observational remediation. What would DNREC propose to do with the data obtained from the

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recovery well? How would this data be used to determine a possible source of the contamination? Would DNREC's action at this site include an investigation of possible sources (sumps, drain lines, etc.) of TCA in the Metal Master's facility?

While we agree that Metal Masters may be responsible for the TCA ground water contamination, we do not feel that we can say conclusively that the lagoons are not the source of this contamination. As discussed during the conference call on March 10, 1993, we have submitted our comments on the Draft RI Report (ERM, January 19, 1993) to Clark Equipment Company. As you will note on your copy of the comments, we have asked Clark Equipment to pursue further investigation in and around the lagoons, so that we may make a more thorough assessment of the contamination.

In addition, our toxicologist has evaluated some preliminary risk numbers using the RI data. There appears to be an unacceptable cancer risk from ground water based on a future potential use scenario (ingestion, inhalation and dermal contact). The risk is primarily due to the 1,1- DCE detected in monitoring well S-1. Therefore, any expedited response action taken at this site should also take into account the DCE contamination.

EPA agrees that we should work toward ways to expedite appropriate clean up measures at the site and would like to pursue further discussions on this matter. Please do not hesitate to contact me at (215) 597-8183.

Sincerely,

Lisa M. Marino

Lisa M. Marino
Remedial Project Manager
DE/MD Section

CC:
Peter Ludzia
Dave Kargbo
Dawn Ioven

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